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Attorneys for Defendants
RELIANCE STANDARD LIFE
INSURANCE COMPANY and THE RSL
GROUP AND BLANKET TRUST

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

MARLON MONTOYA,)	CASE NO. 3:14-cv-02740-WHO
)	
Plaintiff,)	STIPULATION FOR AN ORDER
)	PERMITTING THE LATE FILING OF
v.)	PLAINTIFF'S REPLY BRIEF RE
)	MOTION FOR FEES AND COSTS;
RELIANCE STANDARD LIFE)	ORDER THEREON
INSURANCE COMPANY, THE RSL)	
GROUP AND BLANKET TRUST,)	
)	
Defendants)	Action Filed: June 13, 2014
)	
)	
)	

Pursuant to the Court's order of April 17, 2017, plaintiff's reply brief in support of his motion for fees was due on May 1, 2017;

1 Counsel for plaintiff undersigned had estimated that the reply brief would take 8 hours to
2 complete. However, counsel undersigned has found this brief to require far more time than
3 anticipated. As of Friday, April 29, plaintiff's counsel anticipated a timely filing of the reply brief,
4 and he spent 10.7 hours working on the brief over the weekend to ensure that he would have
5 adequate time to complete it on Monday morning. On Monday, May 1, counsel began working on
6 the brief at 5:30 a.m. Counsel was still working on the brief in the late afternoon, and on review of
7 the brief at the end of the day, counsel decided to strike and re-write whole sections of it. At 11:30
8 p.m., last night, counsel realized the brief would not be ready for filing by midnight, despite having
9 devoted approximately 30 hours to it. Counsel is continuing to work on the brief today, and
10 anticipates having the full day available with the exception of a medical appointment and one
11 conference call. Counsel expects to have the brief ready for filing late today, but in an abundance of
12 caution, plaintiff's counsel requests that he be allowed to file the brief no later than Wednesday, May
13 3, 2017, two weeks before the hearing on the motion, which is scheduled for May 17.

14 The parties have met and conferred, and defendants have no objection to the late filing of Mr.
15 Montoya's reply brief.

16
17 RESPECTFULLY SUBMITTED:

18 Dated: May 2, 2017

LAW OFFICES OF LAURENCE F. PADWAY

19 By: /s/Laurence F. Padway

LAURENCE F. PADWAY

Attorneys for Plaintiff

MARLON MONTOYA

22 Dated: May 2, 2017

23 WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

24 By: /s/Dennis J. Rhodes

DENNIS J. RHODES

Attorneys for Defendants

RELIANCE STANDARD LIFE

INSURANCE COMPANY and THE RSL

GROUP AND BLANKET TRUST

27
28 STIPULATION FOR AN ORDER PERMITTING THE LATE FILING OF PLAINTIFF'S REPLY
BRIEF RE MOTION FOR FEES AND COSTS; ORDER
USDC Northern District Court Case No. 3:14-cv-02740-WHO

1 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

2 I, Laurence F. Padway, attest that concurrence in the filing of this document has been
3 obtained from the other Signatory.

4
5 Dated: May 2, 2017

6 /S/ Laurence F. Padway
7 LAURENCE F. PADWAY

8 Attorneys for Plaintiff


9 **ORDER EXTENDING TIME**

10 Good cause appearing, it is ordered that plaintiff may file his reply brief in
11 support of plaintiff's motion for fees may be filed no later than May 3, 2017.

12
13 **IT IS SO ORDERED.**

14
15 Date: May 3, 2017

By: _____

16 
17 HONORABLE WILLIAM H. ORRICK
18 UNITED STATES DISTRICT JUDGE